

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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IN RE: )  
            ) Chapter 11  
            )  
W.R. GRACE & CO., *et al.*,     ) Case No. 01-01139 (JKF)  
            ) Jointly Administered  
Debtors.     )  
            )

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**NOTICE OF MOTION FOR LEAVE**

TO: Debtor's Counsel, Counsel for the Official Committee of Unsecured Creditors, The United States Trustee and all other parties directly affected by this motion.

The Canadian ZAI Claimants have filed a Motion for Leave to File an Objection to Debtors' Amendment to Motion for an Order (A) Establishing a Proof of Claim Bar Date for Zonolite Attic Insulation Claims and (B) Approving the Related Proof of Claim Form, Bar Date Notices, and Notice Program.

**HEARING ON THE EXPEDITED MOTION WILL BE HELD AT THE COURT'S CONVENIENCE.**

You are required to file a response and the supporting documentation required by Local Rule 4001-1(d) to the attached motion at least five business days before the above hearing date.

At the same time, you must also serve a copy of the response upon Movant's attorney:

Daniel K. Hogan, Esquire  
THE HOGAN FIRM  
1311 Delaware Avenue  
Wilmington, DE 19806  
(302) 656-7540

The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by the motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

By: /s/Daniel K. Hogan  
Daniel K. Hogan

April 15, 2008  
Date